JENNIFER BONJEAN- Pro Hac Vice 1 ASHLEY COHEN- Pro Hac Vice Bonjean Law Group, PLLC. 2 750 Lexington Avenue, 9th Fl. 3 New York, NY 10022 Telephone: (718) 875-1850 4 Facsimile: (914) 462-3482 jennifer@bonjeanlaw.com 5 ashley@bonjeanlaw.com 6 Attorneys for Defendant 7 UNITED STATES DISTRICT COURT 8 DISTRICT OF NEVADA 9 10 LISE LOTTE-LUBLIN, LILI BERNARD, Case No. 2:23-cy-00932-GMN-DJA JANICE BAKER-KINNEY, REBECCA 11 COOPER, LINDA KIRKPATRICK, JANICE DICKINSON, ANGELA LESLIE, PAM JOY 12 ABEYTA, AND HEIDI THOMAS, STIPULATION TO 13 **EXTEND DEFENDANT'S** Plaintiff, TIME TO ANSWER THE 14 **COMPLAINT** 15 v. 16 WILLIAM COSBY JR., Second Request 17 (First Request) 18 Defendant. 19 IT IS HEREBY STIPULATED AND AGREED, by and between counsel for the 20 Plaintiffs, Jordan Merson, Jordan Rutsky, Nathan Werksman, Alice Bohn, Manraj Sekhon, Brian 21 Panish, Rahul Pavipudi, and Robert Glassman, for Lisa Lotte-Lublin, Lili Bernard, Janice Baker-22 Kinney, Rebecca Cooper, Linda Kirkpatrick, Janice Dickinson, Angela Leslie, Pam Joy Abeyta, 23 24 and Heidi Thomas, (hereinafter "Plaintiff"), and Jennifer Bonjean and Ashley Cohen counsel for 25 William Cosby Jr. ("the Defendant") (collectively, "the Parties"), that the time for Defendant to 26 respond to the Complaint be on or before December 8, 2023. 27 28

Denial of this request would deny defense counsel sufficient time to effectively and thoroughly prepare and submit pretrial motions and notices of defense, taking into account the exercise of due diligence.

The Stipulation is entered where counsel for the Defendant has a brief due to the Seventh Circuit Court of Appeals on November 30, 2023. *See USA v. Shawn Baldwin*, 21-2925. Additionally, counsel has a reply motion due in the New York County Supreme Court on December 4, 2023 concerning an entry of default judgment, and a continued expert deposition on the same day. *See Lizette Martinez et al. v. Don Russell, Robert S. Kelly, et al.*. 160759/2021 and *Jose Juan Maysonet, Jr. v. Reynaldo Guevara, et al.*, 18-cv-2342, respectively.

Counsel for Plaintiff does not stipulate to the Defendant's reasoning set forth above but agrees to the extension of time proposed by the Defendant.

This is the Second Stipulation for an extension to file a response herein.

DATED: November 27, 2023

BONJEAN LAW GROUP, PLLC MERSON LAW, PLLC

Counsel for Plaintiff

By <u>/s/ Ashley Cohen</u>
ASHLEY COHEN
Counsel for Defendant
By <u>/s/ Jordan Rutsky</u>
JORDAN RUTSKY
Counsel for Plaintiffs

## **ORDER**

IT IS THEREFORE ORDERED that the Defendant, William Cosby, Jr., herein shall have to and including December 8, 2023, to file a response to the Complaint in this matter.

November DATED this 28th day of \_ , 2023.

DANIEL J. ALBREGTS

UNITED STATES MAGISTRATE JUDGE